

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP D/B/A PACIFIC POWER & LIGHT COMPANY,

Respondent.

DOCKETS UE-230172

**COREY J. DAHL
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT CJD-5

PacifiCorp Response to Public Counsel Data Request 231

September 14, 2023

PC Data Request 231

Re: Equity. Direct Testimony of Christina M. Medina, Exh. CMM-1T, at 5:5–11:13. Please provide the following in regard to each of the equity-related activities and programs described in Medina’s testimony from 5:5–11:13.

- (a) Indicate which programs are still active, which have discontinued, and which are still in development.
- (b) Indicate which programs and activities were voluntarily initiated by the Company and which were required. For programs that were required (i.e. not voluntary) please describe the statute, rule, Commission Order, or other authority requiring each equity program.

Response to PC Data Request 231

- (a) In reference to the direct testimony of Company witness, Christina M. Medina (Exh. CMM-1T):

The Residential Energy Usage Survey was recently administered over the April 18, 2023, through May 9, 2023, timeframe. Survey methodology and results are available in PacifiCorp’s 2023 Clean Energy Implementation Plan (CEIP) Progress Report.

In Docket UE-220940, the Washington Utilities and Transportation Commission (WUTC) allowed proposed changes to Rule 11A to implement moratoriums on disconnection for non-payment during times of extreme weather and poor air quality to go into effect.

The referenced COVID-19 Bill Assistance Program has discontinued.

All other listed activities and programs are active and will continually be examined and/or modified based on feedback, including stakeholder outreach from the Washington Equity Advisory Group (EAG).

- (b) The Company objects to this data request as vague, ambiguous, and calls for legal conclusions as to what programs and activities are voluntary and required to comply with Washington Law, including the Revised Code of Washington (RCW) 80.28.425. Without waiving the foregoing objection, the Company responds as follows:

PacifiCorp operates in accordance with applicable Washington law including RCW 80.28.425, RCW 80.28.100, and the Company’s understanding of the equity guidance provided within *WUTC v. Cascade Natural Gas*, UG-210755, Order 09 (Aug. 23, 2023).

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PREPARER: Christina M. Medina

SPONSOR: To be Determined